

Polek, Jim

From: Greenberg, Ken
Sent: Wednesday, May 07, 2014 6:14 PM
To: Sablad, Elizabeth
Cc: Ty, Fatima; Polek, Jim
Subject: CCH Sand Island Permit

Elizabeth – I wanted to send you a quick note with an overview of my comments and questions about the draft permit for Sand Island. I'll be out of the office for the next few days and back in on Tuesday. Next week I can take some time to fully describe my comments and meet with you to discuss. I need to get out of here in a minute so this will be quick.

Fact Sheet

Descriptions of consent decree affect on existing permit limits may not be accurate. Need to check with ORC.
Justification for Enterococcus compliance schedule – I question the basis given in the fact sheet for the compliance schedule to 2038. There is not necessarily a justification for making the entero schedule same as the schedule for secondary treatment. It may be feasible to comply with the new entero limit on a more expeditious schedule.

Fact Sheet and Permit

Enterococcus interim effluent limit – I question basis for setting limit equal to the highest 30-day geometric mean reading since 2006.

Enterococcus Daily Max limit – footnotes are confusing and possibly conflicting

Ammonia interim effluent limit – I question basis for setting the interim limit at 3 times the highest reading from last several years.

Apologies for making such a rough summary. I'll work out more intelligible comments next week.